

IN THE
Supreme Court of the United States

MARK JANUS,
Petitioner,
v.

AMERICAN FEDERATION OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES, COUNCIL 31, *et al.,*
Respondents.

On Writ of Certiorari to the
United States Court of Appeals
for the Seventh Circuit

CERTIFICATE OF SERVICE

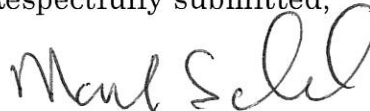
I hereby certify that on January 19, 2018 three copies of the Brief for the American Federation of Labor and Congress of Industrial Organizations as *Amici Curiae* in Support of Respondents were served on each of the following counsel via overnight delivery service:

William L. Messenger
National Right to Work Legal Defense
Foundation
8001 Braddock Road, Suite 600
Springfield, VA 22160
wlm@nrtw.org
(703) 321-8510

David Leigh Franklin
Office of the Attorney General of
Illinois
100 West Randolph Street
Chicago, IL 60604
dfranklin@atg.state.il.us
(312) 814-5376

David Frederick
Kellogg, Hansen, Todd, Figel &
Frederick, PLLC
1615 M Street, NW, Suite 400
Washington, DC 20036
dfrederick@kellogghansen.com
(202) 326-7900

Respectfully submitted,



Mark Schneider
9000 Machinists Place
Upper Marlboro, MD 20772
(301) 967-4510

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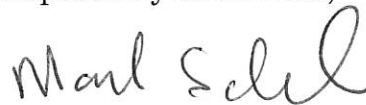
CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioners, was prepared using Century 12-point typeface and contains 5, 249 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2018.

Respectfully submitted,



Mark Schneider
9000 Machinists Place
Upper Marlboro, MD 20772
(301) 967-4510